

**R. Hance Haney**  
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700  
Washington, DC 20036

202 429 3125  
202 293 0561 fax  
Email hhane@qwest.com



March 13A, 2003

**EX PARTE**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: Application by Qwest Communications International Inc. for  
Authority to Provide In-Region InterLATA Services in New  
Mexico, Oregon and South Dakota; WC Docket No. 03-11**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing at the request of Commission staff to respond to WorldCom's claim that Qwest's Customer Service Records ("CSRs"), Firm Order Confirmations ("FOCs") and Service Order Confirmations ("SOCs") sometimes contain inconsistent customer codes ("CUS CODE"), which prevents WorldCom from identifying and submitting the correct CUS CODE on its orders.<sup>1</sup>

The account number ("AN") includes the CUS CODE. Qwest strongly encourages CLECs to provide the full AN on their LSRs to increase the probability that their LSRs will flow through. WorldCom is not prevented from identifying the proper CUS CODE, which it can obtain from the CSR. Qwest's understanding of this issue, which it derived from its daily meetings with WorldCom, is that WorldCom is questioning how it can identify the final CUS CODE as posted on the CSR without having to perform a CSR query. The AN provided on the SOC is the most current AN known to Qwest at the time the order completes in the Service Order Processor ("SOP"). In certain limited instances (based on region and activity types), the billing process updates the CUS CODE, which causes the CUS CODE on the posted CSR to be different than the one sent on the SOC. When this happens, the "Posted to be Billed" Status Update – which is the only notification sent to CLECs via EDI or GUI after the bill posting process – includes the full 16-character AN, but that AN is not updated to reflect any change to the CUS CODE resulting from the bill posting process.

---

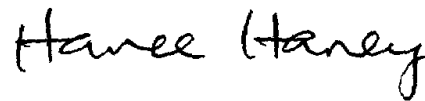
<sup>1</sup> See Reply Comments of WorldCom, Inc., WC Docket No. 03-11, February 27, 2003, ("WorldCom Reply Comments") at 13-14; *see also* Reply Declaration of Sherry Lichtenberg, WC Docket No. 03-11, February 27, 2003, ("Lichtenberg Reply Declaration") ¶¶ 33-35.

Qwest opened a Production Trouble Ticket on Monday, March 3, 2003, that identified this discrepancy, and Qwest plans to change the "Posted to be Billed" Status Update process across all releases to have the Status Update reflect the same CUS CODE as on the CSR. Qwest is in the process of determining when this system modification can be made across all production releases.

Once the system modification is in place, CLECs that subscribe to the Status Update function will receive the CUS CODE as it appears on the CSR. Today, CLECs that do not wish to receive Status Updates are able to retrieve the CSR before submitting orders to ensure that they have the current CUS CODE. As noted above, Qwest strongly encourages CLECs to provide the full AN on their LSRs to increase the probability that their LSRs will flow through.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

A handwritten signature in black ink that reads "Hamee Haney". The signature is written in a cursive, slightly slanted style.

cc: K. Cook  
W. Dever  
G. Remondino  
J. Myles  
K. Brown  
R. Harsch  
H. Best  
D. Booth  
K. Cremer  
A. Medeiros  
R. Weist